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August 17, 2005

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: Notice of Ex Parte Presentation in CC Docket Nos. 96-45, 98-171, 90-571,
92-337, 99-200, 98-170, and NSD File L-00-72

Dear Ms. Dortch:

On August 2, 2005, Mary M. Martin, Chairman, the Seniors Coalition, sent a letter to Chairman Martin in which she explained how abandonment of the current revenues-based Universal Service Fund contribution methodology in favor of a numbers-based methodology would be harmful to low income consumers and would be especially unfair and discriminatory towards America's senior citizens. Indeed, Ms. Martin indicates that a contribution methodology based on working telephone numbers could force many consumers, including seniors, to discontinue their telephone service.

It does not appear that the Seniors Coalition letter was filed in the dockets in which universal service contribution issues are under consideration. A copy of Ms. Martin's letter to Chairman Martin is attached hereto. By this letter, TracFone Wireless, Inc. requests that the Seniors Coalition letter be included in the record of each of the above-captioned dockets. TracFone shares the Senior Coalition's concerns and believes that the Commission should retain a universal service contribution methodology based on interstate revenues. As TracFone has stated on previous occasions, of the contribution methodologies under consideration by the Commission, only a revenues-based plan is equitable and non-discriminatory and competitively neutral.

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Pursuant to Section 1.1206(b) of the Commission's rules, this letter and attachment are being filed electronically in the above-captioned dockets. If you have any questions regarding this filing, please feel free to contact undersigned counsel for TracFone.

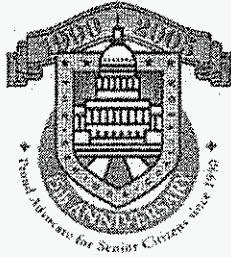
Sincerely,

A handwritten signature in black ink, appearing to read 'MFB', followed by a long horizontal line extending to the right.

Mitchell F. Brecher

enclosure

cc: Mr. Thomas Navin
Mr. Richard Lerner
Ms. Narda Jones
Ms. Cathy Carpino
Mr. Rodger Woock
Mr. James Lande
Mr. Greg Guice
Ms. Carol Pomponio
Mr. James Eisner



THE SENIORS COALITION

Working for a Responsible America

August 2, 2005

The Honorable Kevin Martin
Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Dear Commissioner Martin:

On behalf of more than 4 million members and supporters of The Seniors Coalition (TSC), I want to take this opportunity to voice our strong opposition to the pending rule changes related to the collection of Universal Service Fund (USF) contributions presently under consideration by the Commission.

As you know, the current formula regulating such contributions is based on usage, where subscribers using high volumes of interstate services (including long distance) shoulder a larger portion of the USF contributions than subscribers using little or no interstate services. The pending changes would rewrite this formula to be based on the total number of working telephone numbers, with all users paying an equal share.

Millions of seniors – particularly low-income seniors – throughout the country have turned to pre-paid wireless services to stay connected with family, friends and healthcare providers. This service allows them to participate on a pay-as-you-go basis and provides a valuable method for seniors living on severely restrictive incomes to have access to telephone services. Seniors using this service generally have been shown to use little or no interstate services.

The changes now under consideration by the Commission would hit these seniors hardest and unfairly penalize those low-income seniors who rely on this service. The assignment of a phone number to a pre-paid wireless telephone with generally limited minutes would, under the proposal under consideration by the Commission, force these seniors to unfairly pay the same rate as high-volume users. Such increases would make it virtually impossible for many seniors to afford to continue with pre-paid wireless service, thus eliminating their best option for access to essential telephone services.

Such changes to the existing rules would be unfair and discriminatory towards America's seniors, and would not meet the Communication Act's statutory mandate that the contributions be equitable, nondiscriminatory and competitively neutral.

We know that the Commission is committed to the long-term viability of the USF, and we applaud and support that commitment. However, public policy changes must take into account the usage of interstate telephone services and contributions must be allocated accordingly. Should a formula based on working connections or numbers be utilized, many consumers – particularly seniors – will be forced to cancel their service or will not be able to afford service in the first place and the USF will be left in worse condition.

On behalf of all seniors, we respectfully request that you reject any further consideration of this unfair contribution methodology.

Sincerely,

Mary M. Martin
Chairman